



# Annual Title I Reminders

September 2020

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[Federal Programs Website](#)

## 1. Time and Effort Logs

Federal funds may only be used for employee compensation if appropriate “time-and-effort” records are maintained. Time-and-effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.

2 CFR 200.430(i)(1) states “Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (vii) Support the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.”

NDE recommends that subrecipients continue using the prior time and effort guidance from OMB circular A-87 to ensure adequate support of the distribution of their employee’s salary and wages.

- a. Any personnel paid from Federal Funds must maintain a Time and Effort Log; sometimes called Personnel Activity Records (PARs). A Time and Effort Log is an after-the-fact report of actual activity of an employee. Logs must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person’s schedule such as building principal, HR representative, or superintendent. These logs must be kept on file and will be reviewed during ESEA/ESSA monitoring. Local auditors may also request to see the logs.  
**NOTE:** (1) Time and Effort logs are required for every staff member being paid with **any** source of Federal funds. (2) Substitute teachers being paid with Federal funds, must have a signed PAR. (3) Staff being paid stipends with Federal funds must have a signed PAR.
  - i. Monthly verifications are required if paid from multiple cost objectives and the schedule fluctuates.
    1. An employee is considered to work on multiple cost objectives if s/he works on:
      - a. More than one Federal award;
      - b. A Federal award and a non-Federal award;
      - c. An indirect cost activity and a direct cost activity;
      - d. Two or more indirect cost activities which are allocated using different allocation bases; or
      - e. An unallowable activity and a direct or indirect cost activity
    - ii. Semiannual verifications are required if being paid from only one source or working on a single cost objective.
  - b. **Nebraska’s Substitute/Alternate Time and Effort Reporting System**
    - i. If any employee has a **set schedule, even if working on multiple cost objectives**, s/he may complete semiannual verifications. Verifications (schedule) must be signed by the employee **and** their supervisor or another person in a supervisory

- position who is familiar with the person's schedule, and kept on file.
- ii. Additional information regarding Time and Effort Logs can be found in the *NDE State and Federal Grants Management Guidance*, which can be found [here](#).

**NOTE:** When entering staff information in NSSRS, make sure they are coded correctly. Staff not giving grades (e.g. reading specialist, Title I teachers, etc.) should be coded as 1180 (Teacher Collaborator). The SPI code should follow their funding source: F=Federally funded in schoolwides, 2=Targeted Assistance School. FTE needs to match the percent of time funded. It is important to have accurate information for multiple federal reports.

If you have questions, please contact Beth Wooster at 402-471-2452 or [beth.wooster@nebraska.gov](mailto:beth.wooster@nebraska.gov)

## 2. Parent Notification

- a. Parents of students attending any school in a District that receives Title I funds may request, and the district will provide to the parents in a timely manner, information regarding the professional qualifications of the student's teacher(s). The notification that parents can request this information must be shared annually. This may be done in the schools' handbooks, newsletters, etc.

## 3. School-Parent Compacts

- a. Compacts meeting the ESEA/ESSA requirements are to be provided to Title I students and their parents at least annually. In a Schoolwide Program, this would include ALL students.
  - i. Compacts are to be reviewed annually and updated as needed.
  - ii. It is okay for Schoolwide Programs to include the compact in the Parent Handbook.
  - iii. Signatures by parents and participating students are optional, but strongly encouraged.
- b. The NDE Title I Team has developed a sample School-Parent Compact. It is available on the Title I [webpage](#) under the header "Title I Parent and Family Engagement." This form includes the items required under ESSA and some optional additional items. The document is in Word format so it is easily customizable for each school.
  - i. The use of this particular form is not required. It is only required that buildings have a School-Parent Compact that meets ESSA requirements. Please note if this form is used, please remove the water mark, and footer as these are NDE specific in order for us to post on the website.

## 4. Title I Parent and Family Engagement Policies

Title I Parent and Family Engagement Policies that meet ESEA/ESSA requirements must be **reviewed annually and updated as needed**. These policies are to be shared with parents of participating students—this means ALL students in a Schoolwide Program.

Parent and Family Engagement Policies are required for the district AND each Title I building OR included in a single policy that covers all school and district requirements. Though it is called a policy, **Board approval is not required**. Each Title I Parent and Family Engagement Policy must include seven required components. NDE Title I staff has developed sample Parent and Family Engagement policies that include all of the required components. Sample documents are available on the NDE Title I [webpage](#) beneath the header "Title I Parent and Family Engagement."

## 5. Highly Qualified Paraprofessionals

**PRIOR TO WORKING WITH STUDENTS, Title I Instructional paraprofessionals must meet ESEA/ESSA requirements.** Paraprofessional requirements and other para information can be found ([here](#)), on the Title I website under the header "Paraprofessional Information."

- i. In TAS buildings, this includes any para funded by Title I.
- ii. In a SW program, this includes **ALL** instructional paras.

This information is collected in the Nebraska Staff reporting system and the Title I Paraprofessionals Verification Report in the Nebraska Staff and Student Record System (NSSRS) shows if qualified or not, therefore **NDE will no longer require building principals to annually certify in writing that paraprofessionals meet the requirements.**

## 6. Homeless

- a. Every district is required to set-aside ≥\$100 to be used for children and youth experiencing homelessness or used in the event that such students move into the district.

- i. This is included in the Title I section of the ESSA Consolidated Application.
  - ii. Districts receiving a McKinney-Vento grant must match amount of allocation with Title I funds.
- b. District liaisons are required to be trained and tested using an online program provided by NDE
- c. The District Liaison is the Superintendent unless the district indicates otherwise by including the information on the ESSA Consolidated Application Contact Information page.
  - i. For districts that assign all of their funds to an ESU, the superintendent will be considered the homeless liaison UNLESS you contact Cathy Mohnike at [cathy.mohnike@nebraska.gov](mailto:cathy.mohnike@nebraska.gov) with the name of liaison.

## 7. Schoolwide Eligibility

- a. Schools having a poverty level  $\geq 40\%$  are eligible to become Title I Schoolwide Programs. (Becoming a schoolwide program is an option; not a requirement.)
- b. Schools that are eligible for, but don't already have a Schoolwide Program, may submit a "Title I Schoolwide Intent Form," by November 1<sup>st</sup> and use the 2020-21 school year to develop a schoolwide plan. If you have questions regarding Schoolwide Programs, contact Kirk Russell ([kirk.russell@nebraska.gov](mailto:kirk.russell@nebraska.gov) or 402-471-2741).
- c. Information regarding Title I Schoolwide Programs is available on the NDE Title I webpage: ([here](#)) below the "Schoolwide Program and Resources" header.

## 8. Non-Regulatory Guidance for Title I Fiscal Issues

(February 2008) can be found at the following ([here](#))

This document contains information on the following topics:

- a. Maintenance of Effort
- b. Comparability
- c. Supplement, Not Supplant
- d. Carryover
- e. Consolidating Funds in Schoolwide Programs
- f. Grantback Requirements

**NOTE: Much of the information described in number 8, is also included in the NDE State and Federal Grants Management Guidance ([here](#))**

## 9. Transact

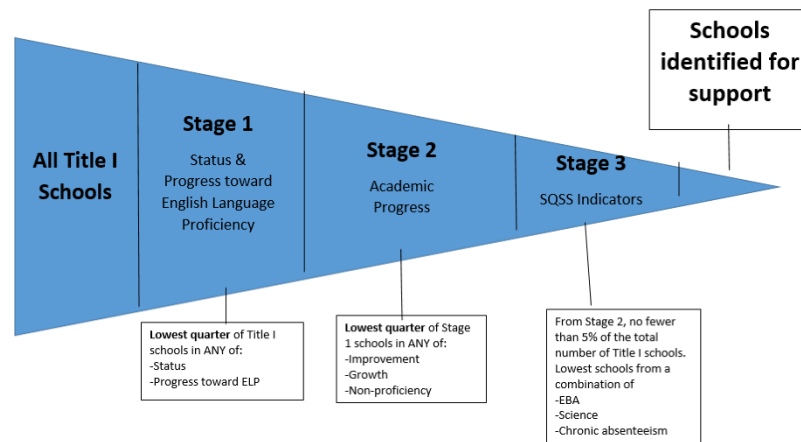
- a. The Nebraska Department of Education has paid the license fee for all Nebraska School Districts for the 2020-21 school year. To access the [Transact website](#) go to the following link: <http://www.transact.com/> The website contains numerous forms that are available in multiple languages
  - i. NDE subscribes to:
    - 1. GenEd collection (20+ languages)—wide ranging forms covering communications to parents on such things as health, medical, school, office, and classroom topics
    - 2. State Masters—includes Home Language Survey questions required by Rule 15 in five languages
    - 3. English Learner Collection (appx 10 languages)—includes program placement form required under Title I, previously required under Title III
    - 4. ESSA Parent Notifications (English and Spanish),
    - 5. 504 Collection (English only). It may be accessed by any person employed by a Nebraska district using your email address. You will just need to set up your password. Districts are encouraged to explore the site. There are some updates from previous years.

## 10. Accountability under ESSA

- a. Nebraska's ESSA Plan was approved in June, 2018. Accountability for a Quality Education System, Today and Tomorrow (AQuESTT) is the system that will be used for both state and federal accountability. The accountability system focuses on the following six tenets:
  - i. Positive Partnerships, Relationships & Student Success
  - ii. Transitions
  - iii. Educational Opportunities and Access
  - iv. College & Career Ready

- v. Assessment, and
  - vi. Educator Effectiveness
- b. AQuESTT will provide Excellent, Great, Good, or Needs Improvement ratings for each school. In addition, states are required to designate schools for Comprehensive Support and Improvement (CSI), Targeted Support and Improvement (TSI) and Additional Targeted Support and Improvement (ATSI). This will be done using a filtering system that begins with ALL Title I schools. See example below for determining Elementary and Middle School CSI schools. The three-year designation of CSI schools initially took place during the 2018-19 school year. Schools were notified of TSI and/or ATSI designations in the fall of 2019. Due to COVID the 2020 NSCAS assessments did not take place. The State is seeking guidance from USDE to determine if new CSI schools will have to be identified in the fall of 2021. Additional information will be shared once there is more clarification.

Comprehensive Support and Improvement - Elementary and Middle Schools



## 11. Requests for Reimbursement

- a. Districts are encouraged to submit requests for reimbursement throughout the school year. The timeline may not be the same for every district. Some may choose to submit quarterly, while others may opt to submit monthly requests. It is advisable to submit requests for reimbursement more than once a year. Districts/ESUs have the option of submitting separate requests for salaries/benefits, and other expenditures. Providing appropriate documentation will speed up the review process. The following expenditures **always** require supporting documentation.
  - i. Credit card purchases
  - ii. Travel expenditures
  - iii. Petty cash purchases
  - iv. Reimbursement to individuals
  - v. Allowable field trips must include the educational value
  - vi. Generally, there is a very high burden of proof that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. There may be unique circumstances where the costs would be permissible because they are reasonable and necessary. To be considered for reimbursement, the district must provide a detailed explanation as to why the purchase is necessary with Federal funds
- b. Information regarding allowable Federal Title Program Expenses is available in the *NDE State and Federal Grant Management Guidance*, beginning on page 39.
- c. Information is also available on the Title I Title [webpage](#) under the header "Allowable Federal Title Program Expenses."

## 13. Ensuring Educational Stability for Children in Foster Care

- a. **Provisions went into effect on December 10, 2016.**
- b. USDE Non-Regulatory Guidance and Dear Colleague Letters available at [www2.ed.gov/about/inits/ed/foster-care/index.html](http://www2.ed.gov/about/inits/ed/foster-care/index.html)
- c. Key points

- i. Intended to minimize disruptions for children in foster care
- ii. A child in foster care will remain in the child's school of origin, unless a determination is made that it is not in the child's best interest to remain in that school.
- iii. If it is in the best interest for the child to enroll in a different school, the child will be immediately enrolled, even if the child is unable to produce records normally required for enrollment.
- iv. Districts that receive Title I funds must develop and implement clear written procedures, in collaboration with the State or local child welfare agency, governing how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded for the duration of a child's time in foster care.
- v. District must designate a point of contact (POC) regarding children in foster care.
- vi. SEC 1112(c)(5)(B) states that LEAs must begin implementing the requirements regarding transportation for students in foster care by **December 10, 2016** (one year after the enactment of ESSA).

## 14. ESEA/ESSA Reviewers and Title I Consultant Assignments

The chart below provides a list of ESEA/ESSA Reviewers and Title I Consultants by ESU area for the 2020-21 school year. The ESEA/ESSA Reviewer is the person responsible for reviewing the ESEA/ESSA Consolidated Application and onsite monitoring. The Title I Consultant is the person who can respond to Title I specific questions.

--2020-21 ESEA/ESSA and TITLE I REVIEWER ASSIGNMENTS --		
ESU	ESSA REVIEWER	TITLE I SPECIALIST
1	Dottie Heusman	Dottie Heusman
2	Pat Frost	Pat Frost
3	Kirk Russell	Kirk Russell
4	Allyson Olson	Jim Kent
5	Pat Frost	Pat Frost
6	Dottie Heusman	Dottie Heusman
7	Pat Frost	Pat Frost
8	Jim Kent	Jim Kent
9	Cathy Mohnike	Cathy Mohnike
10	Cathy Mohnike	Cathy Mohnike
11	Jan Handa	Pat Frost
13	Jim Kent	Jim Kent
15	Anne Hubbell	Dottie Heusman
16	Cathy Mohnike	Cathy Mohnike
17	Kim Larson	Cathy Mohnike
18	Jim Kent	Jim Kent
19	Kirk Russell	Kirk Russell

## 15. NDE Title I Listserv

- a. Occasionally, information regarding Title I is emailed to the Title I listserv. These are not sent on a regular basis, but rather, when important information needs to be shared.
  - i. We are in the process of updating the Title I listserv email addresses. If you no longer wish to receive email messages from the NDE Title I Office, please let us know and your email address will be removed.
  - ii. If someone else in your district or school would like to be added to the Title I listserv, please have them send an email to [beth.wooster@nebraska.gov](mailto:beth.wooster@nebraska.gov) or [kirk.russell@nebraska.gov](mailto:kirk.russell@nebraska.gov) that includes their first and last name, school district, and position.

## 16. 2020-21 ESSA Consolidated Application

- a. Application opened today, September 15 and will be **due to NDE on or before October 30, 2020**. Grants included in the application are Titles I-A, I-D, II-A, III (EL & IE), and Title IV-A.

## 17. Indirect Cost Rates

- b. Indirect cost rates are the same as 2019-20 and can be found. ([Here](#)) The USDE provides the methodology to perform the indirect cost rate calculation. NDE in turn applies this approved methodology to calculate indirect cost rates based on district Annual Financial Reports (AFRs) that are on file at NDE.
- c. Explanations:
  - i. “Restricted Indirect Cost Rates” are used with grant programs that restrict expenditures to those that **supplement but do not supplant** state or local effort. ESEA and IDEA Federal Programs use the restricted rates.
  - ii. “Non-Restricted (or Unrestricted) Indirect Cost Rates” apply to federal programs that allow federal funds to **supplement and/or supplant** local funds. The Child Nutrition Program (school lunch) uses the Non-Restricted rate.

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The ESEA/ESSA 3-Year Monitoring Schedule is available [here](#). All monitoring will be completed virtually for the 2020-2021 school year.

An updated list of Title I Schoolwide Programs is available at <https://www.education.ne.gov/federalprograms/title-i-a-educationally-disadvantaged/#Schoolwide-Program-and-Resources>

Keep up the great work influencing the lives of students, especially during these difficult times.



### Beth Wooster

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